

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

THOMAS H. GOLD
CLERK U.S. DISTRICT COURT
W.D. OF TN. 112248

DEC 29 PM 12:01

RECEIVED

Cedric Jones

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Adams Brothers Produce

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Cedric Jones
(name of plaintiff)

is a citizen of the United States and resides at 766 Ledbetter
(street address)

Memphis
(city)

Shelby
(country)

TN.
(state)

38109
(zip code)

901 691 3732
(telephone number)

3. Defendant Adam Brother Produce
(defendant's name)
lives at, or its business is located at 3301 Winbrook
(street address)
Memphis, TN 38116

4. Plaintiff sought employment from the defendant or was employed by the defendant at
3301 Winbrook
(street address)
Memphis Shelby TN. 38116
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about _____
9 (day) 1 (month) 09 (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____
29 (day) 12 (month) 11 (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____
17 (day) 1 (month) 09 (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on _____. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) ___ sex, (4) ___ religion, (5) ___ national origin, defendant

- (a) ___ failed to employ plaintiff.
(b) ☒ terminated plaintiff's employment.
(c) ☒ failed to promote plaintiff.
(d) _____

10. The circumstances under which defendant discriminated against plaintiff were as follows:

I Cedric Jones was the senior employee at Adams produce for (4) years. I was pass over two times by white men, one of which came from a deli (Jason's) and worked part time for about (4) months and became my boss. I had to train this man to be my boss. on many occasions Dean Hamid (General manager) told me the job was mine. He even said I was doing a much better job than both men hired before me. Bob & Chuck the first and second quit. after this Dean knew I was going to come back to him about this job. So when I went to the company doctor about my ear infection I was fired. My wife took my doctors note to Dean and put it in his hand. I called the supervisor on duty which is Davey weeks. I also have a signed statement from Davey weeks stating I called

11. The acts set forth in paragraph 9 of this complaint

- (a) ☐ are still being committed by defendant.
- (b) ☐ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or
- (b) ☐ Defendant be directed to re-employ plaintiff, or
- (c) ☐ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to Compensate plaintiff for wrongful termination + discrimination

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ☒ No ☐

Cedric Jones
SIGNATURE OF PLAINTIFF